

MEMO ENDORSED

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August 27, 2007

Via telecopier two (2) pages (212) 805-7913

The Honorable Peter K. Leisure
U.S. District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

USDC SDNY
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Re: *Chiquita and GWF v. MV Bosse etc..., et al.*
2007 Civ 6786 (PKL)

Bosse Shipping Ltd. v. GWF
2007 Civ. 7221 (RJS)

Dear Honorable Judge:

We represent Chiquita International Limited ("Chiquita") and Great White Fleet Ltd. ("GWF") in the above entitled actions. It is our understanding that the action entitled *Bosse Shipping Ltd. v. GWF* has been sent to your Honor by the Honorable Judge Swain as The Honorable Judge Sullivan is currently out and the claim involves the same factual circumstances as an earlier filed action entitled *Chiquita and GWF v. MV Bosse*.

In as much as both actions are derived out of the same facts, Chiquita and GWF wish for the matter to be consolidated. In its letter to Judge Swain dated August 24, 2007, Bosse Shipping advised that it consented to a consolidation.

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Page 2 of 2

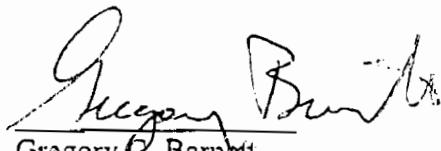
Both actions involve maritime attachments of wire transfers pursuant to ex-parte Orders and both defendants wish to vacate the attachments. As such, the parties discussed a motion schedule and propose that both motions be run in parallel with the following schedule:

September 5, 2007 Moving briefs;
September 12, 2007 Oppositions;
September 17, 2007 Reply papers and all papers to be filed;

The parties would ask the Court to hold oral argument as soon as possible after September 17, 2007.

We appreciate the Court's assistance in this matter.

Very truly yours,


Gregory Q. Barnett

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